

SMITH | VILLAZOR

Smith Villazor LLP
250 West 55th Street, 30th Floor
New York, NY 10019
www.smithvillazor.com

RODNEY VILLAZOR

T 212 582 4400
D 212 377 0852
rodney.villazor@smithvillazor.com

January 3, 2022

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)

Dear Judge Hammer:

Please accept this letter advising the Court regarding an unforeseen, temporary change of Defendant Matthew Goettsche's residence over the New Year's holiday weekend due to the wildfires near Boulder, Colorado.

On Thursday, December 30, 2021, a series of wildfires spread across Boulder County, Colorado, including near Mr. Goettsche's residence in Lafayette, Colorado. That Lafayette house was designated by the Court as the location for his home incarceration. That evening, Mr. Goettsche continually communicated with his assigned Pretrial Services officer and with the undersigned concerning the spread of the wildfires and a potential need to leave. Late that evening, the threat of the wildfires was too great. After disclosing his plans to Pretrial Services in Colorado and the undersigned, he unplugged his location monitoring base charger and left the residence with his wife and children. His wife serves as one of his third-party custodians. Mr. Goettsche and his family then went to his residence in Dillon, Colorado, a property used to partially secure the \$20M bond. Mr. Goettsche re-plugged the location monitoring charging base upon his arrive in Dillon.

On Friday, December 31, 2021, Pretrial Services in Colorado conducted a virtual walk through of the Dillon residence with Mr. Goettsche. On Sunday, January 2, 2022, Mr. Goettsche unplugged his location monitoring base charger in Dillon and traveled back to his Lafayette house after the wildfire danger had dissipated. Again, Mr. Goettsche continued to communicate with Pretrial Services and the undersigned regarding his intentions and planned move back to Lafayette.

Hon. Michael A. Hammer
January 3, 2022
Page Two

Should the Court have any concerns or questions regarding these events, I am available at the Court's convenience. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
SMITH VILLAZOR LLP

cc: Andrew Lourie, Esq.
Benjamin Sauter, Esq.
Amanda Tuminelli, Esq.
Government counsel of record (via ECF and e-mail)
U.S. Pretrial Services Officer David Hernandez (via e-mail)
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)